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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

IN RE META PIXEL TAX FILING CASES

Case No. 5:22-cv-07557-PCP (VKD)

This Document Relates To:

All Actions

**[PROPOSED] ORDER GRANTING
DEFENDANT META PLATFORMS,
INC.'S ADMINISTRATIVE MOTION
TO SEAL PARTS OF THE NOTICE OF
MOTION AND MOTION TO EXCLUDE
THE TESTIMONY OF ROBERT
ZEIDMAN**

Hon. P. Casey Pitts

Pending before the Court is Defendant Meta Platforms, Inc. (“Meta”) Administrative Motion to File Under Seal Parts of Meta’s Notice of Motion and Motion to Exclude the Testimony of Robert Zeidman and its supporting exhibits 1, 3 and 4 (“Motion to Seal and Exhibits”).

Having considered Meta’s Motion to Seal and the declaration of Jessica Stebbins Bina in support thereof (“Bina Decl.”), and finding that there are compelling reasons to justify sealing the below referenced material, **IT IS HEREBY ORDERED THAT** Meta’s Administrative Motion is **GRANTED**.

Compelling reasons exist to seal the following parts of Meta’s Notice of Motion and Motion to Exclude the Testimony of Robert Zeidman and its supporting exhibits identified below:

Document	Portions of Document to Be Sealed	Reason for Redaction	Ruling
Notice of Motion and Motion to Exclude the Testimony of Robert Zeidman	1:28; 2:1-3; 2:21; 11:2; 12:5; 14:20; 14:24-25; 14:27-28; 15:2-4; 15:7-8; 15:9-11; 15:19-24; 15:26-28; 16:1-3; 16:8-9; 17:13-15; 18:16-18; 18:23; 20:6-17 (in red text)	This text should be redacted because it reveals specific, non-public information about Meta’s proprietary data storage systems, including the names of specific Hive tables and fields in those tables. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta’s systems. For example, it could allow bad actors to locate and access data that Meta stores in its proprietary systems, including data related to users.	
Exhibit 1	Parts of pages 72:7, 77:8-9; 87:10-12; 92:24-25; 93:5; 95:8; 95:14-15; 95:17-19; 96:25; 97:1-2, 140:19-20; 146:1-3; 146:5-6; 146:8-9; 146:11-13; 146:15-19; 154:15; 159:6-12; 159:15; 159:18-20;	This text should be redacted because it reveals specific, non-public information about Meta’s proprietary data storage systems, including the names of specific Hive tables and fields and how the systems are organized. If this information were disclosed, it would	

1		159:23-24; 160:8; 160:10-12; 160:18; 160:20-21; 160:23-24; 161:7-11; 161:13-18; 161:20-21; 172:11-12; 174:4-9; 174:16; 178:19- 20; 179:6-8; 180:4-5; 180:10-14; 180:16-17; 180:21; 180:25; 181:5; 181:8-13, 182:12-13, 182:15	competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems. For example, it could allow bad actors to locate and access data that Meta stores in its proprietary systems, including data related to users.	
2		(highlighted in yellow)		
3	Exhibit 3	Entire Document.	This text should be sealed because it reveals specific, non-public information about Meta's proprietary data storage systems, including the names of specific Hive tables and fields and how the systems are organized. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems. For example, it could allow bad actors to locate and access data that Meta stores in its proprietary systems, including data related to users.	
4	Exhibit 4	Entire Document.	This text should be sealed because it reveals specific, non-public information about Meta's proprietary data storage systems, including the names of specific Hive tables and fields and how the systems are organized. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems. For example, it could allow bad	

		actors to locate and access data that Meta stores in its proprietary systems, including data related to users.	
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For the foregoing reasons, Meta’s Administrative Motion to File Under Seal Parts of Its Notice of Motion and Motion to Exclude the Testimony of Robert Zeidman and its supporting exhibits 1, 3 and 4 (“Motion and Exhibits”) thereto is GRANTED. The aforementioned materials are entitled to protection under the law, satisfying the requirements of Civil Local Rule 79-5(b), and shall remain under seal.

IT IS SO ORDERED.

DATED: _____

HONORABLE P. CASEY PITTS
UNITED STATES DISTRICT JUDGE